

United States District Court

for the

Southern District of Texas

UNITED STATES OF AMERICA)

V.)

Bryan Rafael TEJADA) Case Number:

Daisy PEREZ)

Fernando LAGOS-Mejia)

)

)

)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 25, 2018 in the county of Webb in the
 (Date)
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*Title 8 United States Code, Section
1324

Did unlawfully transport and move, and conspired to transport and move, Guatemalan nationals Juan CASTRO-Aguilar, Filiberto SOSA-Rivera, Alvaro CORTEZ-Escobar, Atzel DIONICIO-Mendez and eight (8) other undocumented aliens by means of a motor vehicle or otherwise within the Southern District of Texas, knowing or in reckless disregard of the fact that said aliens had come to, entered, or remained in the United States in violation of law, and transported and moved said aliens in furtherance of such violation of law.

This criminal complaint is based on these facts:

See attachment "A".



Continued on the attached sheet.

/S/ Hector Benavides

Complainant's Signature

Hector Benavides, Special Agent

Printed Name and Title

Sworn to before me and signed in my presence,

Date: June 27, 2018Judge's SignatureCity and State: Laredo, TexasDiana Song Quiroga, U.S. Magistrate Judge

Printed Name and Title

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Bryan Rafael TEJADA**Daisy PEREZ****Fernando LAGOS-Mejia****[CONT OF BASIS OF COMPLAINT]**

On June 25, 2018, a Border Patrol agent (BPA) assigned to the Laredo South (LRS) Border Patrol Station responded to a request from the Laredo, Texas, Police Department (LPD). LPD officers were in pursuit of a silver Dodge Durango that was heading westbound on Del Mar Blvd. The BPA noticed several LPD units with lights and sirens following the silver Dodge Durango as it turned south on San Bernardo Avenue. The BPA followed the units for approximately one mile and noticed the silver Dodge Durango had crashed into a Ford Mustang at the intersection of San Bernardo Avenue and Mann Road. The silver Dodge Durango came to a complete stop on top of a grassy area next to a business parking lot. Seven (7) subjects were seen exiting the silver Dodge Durango and running towards the back of a nearby business. All seven (7) subjects were apprehended and determined to be citizens of Guatemala, illegally present in the United States. The driver, who was identified as Bryan Rafael TEJADA, was arrested by LPD officers for multiple state felony charges. TEJADA suffered minor injuries from the vehicular crash. Three (3) of the Guatemalan undocumented aliens (UDAs) were transported to the hospital where they were treated for minor injuries and released. The remaining UDAs were transported to the LRS for interviewing and processing.

Homeland Security Investigations (HSI) special agents (SAs) were contacted for investigative assistance and responded to the incident. At the Webb County Jail, Tejada was advised of his Miranda warnings, to which he freely waived and agreed to speak with HSI SAs without a lawyer present. TEJADA stated he had knowledge that he was transporting UDAs. TEJADA stated he was recruited to transport the UDAs. TEJADA stated he was going to be paid him between four hundred (\$400) to five hundred dollars (\$500) to transport the group of UDAs to San Antonio, Texas.

During interviews, TEJADA provided HSI SAs and BPAs with information regarding a possible alien stash house located at the 1900 block of Aldama Street. HSI SAs, BPAs, and LPD police officers approached the suspected alien stash house for a knock and talk. Daisy PEREZ answered the door and officers identified themselves as a law enforcement. PEREZ was asked for consent to search the residence and she gave consent for the search. After entering the home, agents discovered six additional subjects who were determined to be illegally present in the United States. Four (4) subjects were determined to be citizens of Mexico, and two (2) were citizens of Guatemala. One of the subjects identified, was Fernando LAGOS-Mejia, a citizen of Mexico, who was determined to be the caretaker of the alien stash house. All subjects were placed under arrest and transported to the LRS Border Patrol Station for further processing. During a search of the residence, agents located an alien smuggling ledger listing various names, dates of arrival, and dates of departure. It was noted that the final entry in the ledger listed the names of the seven Guatemalan UDAs that were involved in the Dodge Durango vehicular crash earlier that morning.

LAGOS was advised of his Miranda warnings, to which he freely waived and agreed to talk to HSI SAs without a lawyer present. LAGOS stated he was an undocumented alien who was trying to get to Miami, Florida, to rejoin his brother already in that area. LAGOS indicated he was put in charge of the alien stash house by an unknown male in exchange for a discount on his own alien smuggling fee. LAGOS admitted he was aware the other individuals in the alien stash house were also illegally present in the United States, but indicated the ledger found at the alien stash house was not his.

PEREZ was advised of her Miranda warnings, to which she freely waived and agreed to talk to HSI SAs without a lawyer present. PEREZ initially stated she was LAGO's girlfriend and was simply visiting him at his house which is located at the 1900 block of Aldama Street. However, she later recanted her statement and indicated she and her boyfriend, LAGOS, were caretakers at the residence. PEREZ stated she would help LAGOS by cleaning the residence and cooking food. PEREZ stated an unknown male would periodically arrive at the residence and bring food for the UDAs as well as pay LAGOS between three hundred (\$300) to four hundred dollars (\$400) weekly to care for the alien stash house. PEREZ stated in turn, LAGOS would give her spending money.

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[CONT OF BASIS OF COMPLAINT]

Juan CASTRO-Aguilar, and Filiberto SOSA-Rivera were among the UDAs apprehended in the silver Dodge Durango and are being held as material witnesses. Both Guatemalan material witnesses stated they paid money to be smuggled into the United States. Both material witnesses stated they entered the United States illegally, by crossing the Rio Grande River by raft. Both material witnesses indicated they were taken to an unknown residence where they stayed for a short while until they were picked up by a male driving an unknown vehicle. Both material witnesses stated during the drive, the driver led police officers on a pursuit that ended when their vehicle collided with another unknown vehicle. Both material witnesses provided descriptions of the driver who was identified as TEJADA.

Alvaro CORTEZ-Escobar, and Atzel DIONICIO-Mendez were among the UDAs at the alien stash house and are being held as material witnesses. Both Guatemalan material witnesses stated they paid money to be smuggled into the United States. Both material witnesses stated they entered the United States illegally, by crossing the Rio Grande River by raft. Both material witnesses indicated they were taken to an unknown residence. Both material witnesses identified the caretakers of the stash house as LAGOS and PEREZ. Both stated PEREZ would cook for them while LAGOS wrote their names down in a ledger. Both material witnesses indicated several of the UDAs in the residence were picked up earlier that morning.

[END]